



U.S. Department of Justice

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January 7, 2025

BY ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Center for Biological Diversity et al. v. Nat'l Marine Fisheries
Service*, No. 24 Civ. 2576 (GHW)

Dear Judge Woods:

This Office represents defendant the National Marine Fisheries Service ("NMFS") in the above-referenced Freedom of Information Act ("FOIA") matter. In accordance with the Court's order dated November 7, 2024 (ECF No. 32), we write respectfully on behalf of the parties to provide a status report.

As noted in prior status reports, NMFS re-reviewed and reprocessed the records it had previously withheld in full and, in October 2024, it made a supplemental production of that material, which comprised 926 records totalling over 5,000 pages. The parties are continuing to meet and confer in an effort to narrow and, where possible, resolve any remaining issues in dispute; most recently, in December 2024, NMFS provided plaintiffs with draft indexes further explaining the nature of the withheld information and the basis for the agency's withholdings. To allow the parties' discussions to continue, we respectfully request permission to submit a further status report by Monday, March 10, 2025.

We thank the Court for its consideration of this letter.

Respectfully submitted,

EDWARD Y. KIM
Acting United States Attorney for the
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cc: *Plaintiffs' counsel* (by ECF)